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IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEVADA

In re:)	Chapter 11
REZA ATHARI & ASSOCIATES,)	No. 14-10724-ABL
P.L.L.C.)	
Debtor.)	EXPARTE MOTION FOR REDACTION
)	OF DEBTOR'S BANK ACCOUNT/
)	CREDIT ACCOUNT INFORMATION

Debtor Reza Athari & Associates, P.L.L.C, (hereafter "Debtor,") by and through its undersigned counsel, respectfully files this *"Ex-Parte Motion For Redaction of Debtor's Bank Account/ Credit Account Information"* to redact and maintain under seal certain information the debtor inadvertently disclosed on its underlying schedules, mailing matrix and a monthly operating report, respectively located at Docket #1, #38, #39, #49 and #53. This motion is brought pursuant to 11 U.S.C. Section 107(c)(1) and Rule 9018 of the Federal Rules of Bankruptcy Procedure.

In support of this Motion, the debtor respectfully represents as follows:

A. Background

1. Debtor filed its petition for Chapter 11 relief on February 3, 2014.
2. Debtor is a professional limited liability company organized by Reza Athari, its wholly-owner member and manager (hereafter "Mr. Athari.")
3. Mr. Athari is an AV rated immigration and nationality lawyer who maintains offices in various jurisdictions including Utah, Nevada and California.
4. Mr. Athari has arisen to national acclaim and its frequently called upon to comment concerning immigration and nationality issues that confront our country.
5. Despite his overall success as an attorney over the decades, Mr. Athari was not immune from the real estate decline that affected the southwest including the Las

Vegas, Nevada, metropolitan area.

6. As a consequence, the debtor commenced this case under Title 11 on February 3, 2014, by filing its voluntary petition and later its schedules. After the filing of these various pleadings, the debtor became aware that certain banking and credit account information remained on specific filings located at Docket 1, 38, 39, 49 and 53.

B. Relief Requested

7. By this motion, the debtor respectfully requests that the Court allow substitution of the following redacted document, each of which delete any reference to the debtor's bank account information and credit account information contained in the original filings:

Docket No.	Document	Redacted Document	Exhibit No.
1	Voluntary Petition	Voluntary Petition	A
38	Mailing Matrix	Mailing Matrix	B
39	Schedules	Schedules	C
49	Amended Schedules	Amended Schedules	D
53	Monthly Operating Report	Monthly Operating Report	E

Further, the debtor respectfully requests that the Court allow the substitution of the attached exhibits for those referenced docket entries set forth above.

C. Basis For Relief

4. 11 U.S.C. Section 107(c)(1) of the Bankruptcy Code provides bankruptcy courts with the authority to limit the disclosure of certain confidential information so as to protect parties from potential harm such as identity theft. Section 107(c)(1) provides, in relevant part:

The bankruptcy court, for cause, may protect an individual, with respect to the following type of information to the extent that the court finds that the disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:

(A) Any means of identification (as defined as 1028(d) of Title

1 18) contained in a paper filed, or to be filed in a case under
2 this title.

3 (B) Other information contained in a paper described in
4 subparagraph (A).

5 Clearly, the debtor's bank account information and credit account information is a
6 highly sensitive set of information that needs to be redacted from the exhibit mentioned
7 above in order to avoid exposing the debtor to any risk of identify theft. Therefore, 11
8 U.S.C. Section 107(c)(1) applies and the requested information should be redacted.

9 Furthermore, Bankruptcy Rule 9018 expands on the procedural protection afforded
10 by 11 U.S.C. Section 107c, providing in relevant part that "[o]n motion or on its own
11 initiative, with or without notice, the court may make any order which justice requires. ... to
12 protect the estate or any entity in respect to a trade secret or other confidential research,
13 development, or commercial information." Fed.R.Bank.P. 9018 (emphasis added.) Bank
14 account information and credit account information are highly sensitive information
15 requiring the requested redaction pursuant to Federal Rule of Bankruptcy Procedure 9018.

16 **D. Conclusion**

17 Therefore, in order to correct a simple mistake or inadvertence, the debtor asks this
18 court to utilize the power afforded to it by 11 U.S.C. Section 107(c)(1) and Rule 9018 of the
19 Federal Rules of Bankruptcy Procedure to redact the debtor's confidential information from
20 the debtor's schedules.

21 Dated this 29th day of April, 2014.

22 OWENS & PYPER, P.L.C.

23 /s/ Mark B. Pyper

24 Mark B. Pyper, Proposed Counsel
25 For The Debtor-in-Possession
26 Reza Athari & Associates, PLLC
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